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August 30, 2007

By U.S. Mail

Frank R. Bodor, Esq. 157 Porter Street, N.E. Warren, OH 44483

RECEIVED

**NEW YORK** 

AUG 3 1 2007

RE: Lorraine L. Cerimele v. Lexington Precision Corporation, et al. Trumbull County Court of Common Pleas, Case No. 00-CV-1997 ATTY. FRANK BODOR

Dear Mr. Bodor:

Enclosed are two CD-ROMs containing over 22,500 pages of documents (the equivalent of eight bankers' boxes) in response to Plaintiff's Request for Production of Documents. We have reviewed these documents for privilege and have attempted to tie these documents to your client's Requests. While we have attempted to review all of the documents for privilege, it is possible that some privileged documents may still be inadvertently produced. To the extent any privileged documents are inadvertently produced, we reserve the our right to preserve any privilege attached to these documents. This specifically applies, but is not limited to, any "controlled" documents.

In addition, we have noticed some duplication in the documents produced. We suspect this is because these documents were culled from departments with overlapping functions and recordkeeping.

Finally, we are in possession of a DVD-ROM containing electronic versions of various work instructions, inspection instructions, mold reports, audit reports, PPAP's, process reports, SPC documents, and other materials. These computer files still need to be reviewed for privileged information and to determine the specific Requests to which they are responsive. This DVD-ROM contains approximately 3,200 files and nearly 114,000 pages to review. We will provide those to you as soon as we have reviewed them, but given the number of files and pages, our review may last into October. The most time consuming part of this process will be to determine the specific Requests to which the files are responsive. We can produce these documents sooner if there is no need to tie these electronic files to the Requests. Please let us know your preference.

Below is a summary of the documents produced:

1. Documents LEX000001-LEX000150 are documents related to Direct Ship and are generally responsive to Request for Production No. 1. Documents in the LEX000044-LEX000086 range may also relate to Request No. 7 (cure time reduction).

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- 2. Documents LEX000151-LEX000787 are documents related to inspector efficiency and are generally responsive to Request for Production No. 2. However, some of the documents in this range may also be responsive to Request No. 5 (customer rejections).
- 3. Documents LEX000788-LEX002475 are documents related to inspection audit reports and are responsive to Request for Production No. 2.
- 4. Documents LEX002476-LEX002718 are documents related to tooling and are generally responsive to Request for Production No. 3. However, some of the documents in this range may also be responsive to Request Nos. 5 and/or 9 (customer rejections and AMP/Delphi/Elcom tools).
- 5. Documents LEX002719-LEX002759 are documents generally related to customer rejections and rework. These documents are generally responsive to Request for Production Nos. 3, 5, and 9. LEX002721, LEX002729 and LEX002743 appear to be inspection documents responsive to Request No. 2.
- 6. Documents LEX002760-LEX004689 are documents related to customer rejections and rework and are generally responsive to Request for Production No. 5. These documents may also be responsive to Request Nos. 2, 3, 7, 8 and 9. Documents contained here include training records, audit reports, customer complaints, correspondence related to customer complaints, process flow diagrams, control plans, 100% inspection documents, internal problem resolutions, and other documents related to or arising from customer rejections and/or complaints.
- 7. Documents LEX004690-LEX014543 are documents related to cure time reduction and are generally responsive to Request for Production No. 7. However, some of the documents may also contain inspection documents and financial documents responsive to Request Nos. 2 and 4 (inspection and financials).
- 8. Documents LEX014544-LEX015320 are documents related to cure time reduction, material mixing, and batch testing and are generally responsive to Request for Production No. 7. However, some of the documents in this range may also contain inspection documents responsive to Request No. 2.
- 9. Documents LEX015321-LEX017320 are documents related to shipping and are responsive to Request for Production No. 8 (shipping documents).

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- 10. Documents LEX017321-LEX018534 are documents related to AMP, Delphi and Elcom tools/molds and are generally responsive to Request for Production No. 9. However, some of the documents in this range may also contain documents responsive to Request Nos. 3 and 5 (tools and customer rejections).
- 11. Documents LEX018535-LEX019042 are mold reports related to AMP, Delphi and Elcom molds are generally responsive to Request for Production No. 9.
- 12. Documents LEX019043-LEX019073 are documents related to awards and recognitions and are responsive to Request for Production No. 11.
- 13. Documents LEX019074-LEX019077 are business cards that are responsive to Request for Production No. 12.
- 14. Documents LEX019078-LEX019079 are documents related to awards and recognitions and are responsive to Request for Production No. 11.
- 15. Documents LEX019080-LEX019083 are responsive to Request for Production No. 7 (cure time reduction).
- 16. Document LEX019084 is responsive to Request for Production Nos. 3 and 9 (tools and AMP/Delphi/Elcom tools).
- 17. Documents LEX019085-LEX019089 are responsive to Request for Production Nos. 5, 7 and 9 (customer rejections, cure time reduction, and AMP/Delphi/Elcom tools).
- 18. Documents LEX019090-019091 are responsive to Request for Production No. 7 (cure time reduction).
- 19. Documents LEX019092-LEX019093 are responsive to Request for Production No. 6 (tumbling).
- 20. Documents LEX019094-LEX019096 are responsive to Request for Production No. 3 (tools).
- 21. Documents LEX019097-LEX019101 are responsive to Request for Production No. 5, 7 and 9 (customer rejections, cure time reduction, and AMP/Delphi/Elcom tools).

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- 22. Document LEX019102 is responsive to Request for Production No. 9 (AMP/Delphi/Elcom tools).
- 23. Documents LEX019103-LEX22517 are mold reports related to AMP, Delphi and Elcom molds are generally responsive to Request for Production No. 9.
- 24. Documents LEX022518-LEX022534 are operator reports of defects and are responsive to Request No. 5 (customer rejections).
- 25. Documents LEX022535-LEX022541 are responsive to Request for Production No. 6 (tumbling).
- 26. Documents LEX022542-LEX022595 are documents related to liquid nitrogen usage and are responsive to Request No. 6 (tumbling).

If you have any questions, do not hesitate to contact me.

Sincerely,

Adam D. Fuller

**Enclosures** 

ce: Christopher R. Johnson, Esq. Mark S. Floyd, Esq.